# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
01-CA-299996	7-25-2022	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT		
a. Name of Employer Starbucks Corporation		b. Tel. No. (b) (6), (b) (7)(C)	
		c. Cell No.	
1.5.11	La Faraltana Barana atalian	f. Fax. No.	
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134	e. Employer Representative Howard Schultz, CEO	g. e-mail (b) (6) (b) (7)(G) (a) starbucks.com	
874 Commonwealth Ave, Brookline, MA 02446	(b) (6), (b) (7)(C)	h. Number of workers employed	
	S	30	
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage		
	ging in unfair labor practices within the meaning of section	8(a), subsections (1) and	
(list subsections) (5) and (3)	of the National Labor Re	elations Act, and these unfair labor	
practices are practices affecting commerce within the me	aning of the Act, or these unfair labor practices are practice	es affecting commerce within the	
meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act and engaged in conduct toward employees attempting to discourage union activity, by acts and conduct including the following, which began immediately after workers at the store voted to be represented by the Union: Engaging in massive reduction of hours; threatening discipline; stricter enforcement of policies; imposing a new availability policy; failure to give notice or an opportunity to bargain to the Union over any of the above. The Union requests relief under Section 10(j) of the Act.			
3. Full name of party filing charge <i>(if labor organization, g</i> Workers United	ive full name, including local name and number)		
4a. Address (Street and number, city, state, and ZIP code 22 South 22nd Street, Philadelphia, PA 19103	9)	4b. Tel. No. 267-709-4037	
		4c. Cell No.	
		4d. Fax No.	
		4e. e-mail richard.minter@workers-united.org	
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Workers United, a/w SEIU			
, I declare that I have read the abo	ARATION ve charge and that the statements	Tel. No. 716-608-3427	
are true to the best of my knowledge and belief.  Ian Hayes, Attorney		Office, if any, Cell No.	
(signature of representative or person making charge) (Print/type name and title or office, if any)		Fax No.	
Hayes Dolce Address 135 Delaware Ave., Ste. 502, Buffalo, NY 14202  Date 7-25-22		e-mail ihayes@hayesdolce.com	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD **CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
03-CA-290555	2/14/2022	

#### INSTRUCTIONS:

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT		
a. Name of Employer		(h) (c) (h) (7)(c)
Starbucks Corporation		(b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) @starbucks.com
(see attached for Buffalo-area location addresses)	(see attached for (b) (6), (b) (7)(C)	h. Number of workers employed 500
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of sectio	n 8(a), subsections (1) and
(list subsections) (3); (5)	of the National Labor	Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practi	ices affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Since around February 2022, the Employer has been implementing a policy throughout the Buffalo area regarding an employee availability requirement, under which employees are facing termination, (1) in order to discourage Union activity and (2) at its union-represented Elmwood Ave and Genesee St locations, (i) without giving the Union notice or an opportunity to bargain and (ii) without obtaining the Union's consent, despite the parties not having reached overall agreement or impasse on a first contract.		
The Union seeks injunctive relief under Section 10 Starbucks' unlawful conduct.	(j) of the Act to prevent irreparable destruction of	employee rights resulting from
3. Full name of party filing charge (if labor organization, gr Workers United	ive full name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code 2954 Main Street, Suite 556	<del>)</del> )	4b. Tel. No. 585-473-3280
Buffalo, NY 14214		4c. Cell No.
		4d. Fax No.
		4e. e-mail gobonadonnajr@rrjb.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Workers United, a/w SEIU		
I declare that I have read the abo	ARATION ve charge and that the statements by knowledge and belief.	Tel. No. 716-608-3427
lan Hayes	Ian Hayes, Attorney	Office, if any, Cell No.
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Hayes Dolce Address 471 Voorhees Ave, Buffalo, NY 14216	Date Feb 14, 2022	e-mail ihayes@hayesdolce.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

# Attachment to Unfair Labor Practice charge

### Section 1.d – Address

- 520 Lee Entrance, Amherst, NY 14228 (Store #7318)
- 1703 Niagara Falls Blvd, Amherst, NY 14226 (Store #07327)
- 8100 Transit Road Suite 100, Williamsville, NY 14221 (Store #07337)
- 5429 Main Street, Williamsville, NY 14221 (Store #07340)
- 933 Elmwood Avenue, Buffalo, NY 14222-1211 (Store #07381)
- 235 Delaware Avenue, Buffalo, NY 14202 (Store #07448)
- 3540 McKinley Parkway, Blasdell, NY 14219 (Store #07486)
- 4770 Transit Road, Depew, NY 14043 (Store #07665)
- 2730 Delaware Avenue, Buffalo, NY 14216 (Store #07799)
- 5395-5495 Sheridan Drive, Amherst, NY 14221 (Store #07938)
- 1775 Walden Ave. Ste 500, Cheektowaga, NY 14225 (Store #07949)
- 9660 Transit Road 101, East Amherst, NY 14051 (Store #10750)
- 6690 Niagara Falls Boulevard, 100, Niagara Falls, NY 14304 (Store #19901)
- 6703-6733 Transit Rd., Buffalo, NY 14221 (Store #22882)
- 4243 Genesee St., Cheektowaga, NY 14225 (Store #23917)
- 3220 Sheridan Drive, Amherst, NY 14226 (Store #47843)
- 3015 Niagara Falls Blvd., Amherst, NY 14228 (Store #50060)
- 5120 Camp Road, Hamburg, NY 14075-2704 (Store #59087)
- 3235 Southwestern Blvd, Orchard Park, NY 14127 (Store #63771)

### **Section 1.e – Employer Representative**

(b) (6), (b) (7)(C) (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) @starbucks.com

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
03-CA-293362	04/012022	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1 EMDI	OYER AGAINST WHOM CHARGE IS BROUGHT	urring.
	OTER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Starbucks Corporation		(b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Employer Representative	
2401 Utah Avenue South, Suite 800 Seattle, WA 98134	Howard Schultz, CEO (b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) @starbucks.com
4770 Transit Road, Depew, NY 14043	(b) (b), (b) (1)(b)	
4770 Halish Road, Depew, NT 14045	starbucks.com	h. Number of workers employed 30
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of sec	tion 8(a), subsections (1) and
(list subsections) (3) (5)	of the National Labo	or Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are pra	actices affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		· ·
Basis of the Charge (set forth a clear and concise state See attached	ement of the facts constituting the alleged unfair labor j	oractices)
Full name of party filing charge (if labor organization, g. Workers United	ive full name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code 2954 Main Street, Suite 556	9)	4b. Tel. No. 585-473-3280
Buffalo, NY 14214		4c. Cell No.
		4d. Fax No.
		4e. e-mail gbonadonnajr@rrjb.org
5. Full name of national or international labor organization Workers United, a/w SEIU	n of which it is an affiliate or constituent unit (to be filled	in when charge is filed by a labor organization)
, I declare that I have read the abo	ARATION ve charge and that the statements	Tel. No. 716-608-3427
an Hayes	ny knowledge and belief. Ian Hayes, Attorney	Office, if any, Cell No.
(signature o represen a ve or person making charge)	(Print/type name and title or office, if any)	Fax No.
Hayes Dolce Address 471 Voorhees Ave., Buffalo, NY 14216	Date Apr 1, 2022	e-mail ihayes@hayesdolce.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

### **Section 2- Basis of the Charge:**

In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act and engaged in conduct toward employees attempting to discourage union activity, by acts and conduct including the following:

On or about (b) (6), (b) (7)(C), 2022, by terminating union supporter (b) (6), (b) (7)(C); and

On or about (b) (6), (b) (7)(c), 2022, by terminating union supporter (b) (6), (b) (7)(c)

The Union was certified by the NLRB as the bargaining representative of employees on March 17, 2022, following a ballot count on March 9, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the discipline of (b) (6), (b) (7)(C) or (b) (6), (b) (7)(C), in violation of its obligations to bargain under the Act.

The Union seeks expedited injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights by Starbucks' illegal activity, which is increasing in aggression and severity daily.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date F ed	
03-CA-295470	5/10/2022	

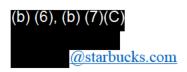
#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT  2. Name of Emp oyer Starbucks Corporation  2. Address (Street, city, state, and ZIP code) 2. Address (Street, city, state, and ZIP code) 2. Emp oyer Representative Howard Schultz, CEO Seattle, WA 98134 4. Ce Ro.  1. Fax. No.  4. College Ave, Ste 402, Ithaca, NY 14850 1. Type of Estab strinent (factory, mine, wholesaler, etc.) 1. Identity principa product or service Food and beverage (list subscitions) (3); (5) 1. Summer of workers emp oyed 30  3. Fu name of party 1 in charge (if labor organization Act. 2. Bas s of the Charge (set forth a clear and conclese statement of the facts constituting the alleged unfair labor practices 3. Fu name of party 1 in charge (if labor organization, give full name, including local name and number) Workers United 4. Address (Street and number, city, state, and ZIP code) 2. State of the Charge (set forth a clear and conclese statement of the facts constituting the alleged unfair labor practices)  3. Fu name of party 1 in charge (if labor organization, give full name, including local name and number) Workers United 4. Address (Street and number, city, state, and ZIP code) 4. Te No. 5. Fu name of nations or internations abort organization of which is an affiliate or constituent unit to be filled in when charge is filed by a labor organization) Workers United 4. Declare that I have read the above charge and that the statements in the charge of the c	File an original with NLRB Regional Director for the region in	which the alleged unfair labor practice occurred or is occ	urring.
Starbucks Corporation  d. Address (Street, city, state, and ztP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134  402 College Ave, Ste 402, Ithaca, NY 14850  Type of Estab shmerit (Inctory, mine, wholesaler, etc.) Type of Estab shmerit (Inctory, mine, wholesaler, etc.) Type of Estab shmerit (Inctory, mine, wholesaler, etc.) The above named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) Type of Estab shmerit (Inctory, mine, wholesaler, etc.) The above named employer has engaged in and is engaging in unfair labor practices within the meaning of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2. Bas so the Charge (set forth a clear and concise statement of the facts constituting the alteged unfair labor practices)  See Attached  3. Fu name of party 1 ng charge (if labor organization, give full name, including local name and number) Workers United  4a. Address (Street and number, city, state, and ziP code)  2554 Main Street, Suite 556  Buffalo, NY 14214   4b. Te. No.  4c. e-ma gbonadomanji@rijb.org  5. Fu name of nationa or international abor organization of which 1 s an aff ate or constituent un 1 (to be filled in when charge is filled by a labor organization) Workers United, a/w SEIU  6. DECLARATION 1 declare that I have read the above charge and that the statements are true to the best of my knowledge and belief Michael Dolce, Attorney  6. Pichtypen name and title or office if any) Fax No.  F	1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT	
d Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134 402 College Ave, Ste 402, Ithaca, NY 14850  Type of Estab strinent (factory, mine, wholesaler, etc.) The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act. 2 Bas s of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  See Attached  3. Fu name of party 1 ng charge (if labor organization, give full name, including local name and number) Workers United 4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214  4b. Tex No.  4c. e-ma ghonadomaji@rijb.org 5. Fu name of nationa or international abor organization of which 1 s an aff ate or corst tuent unit (to be filled in when charge is filed by a labor organization) Workers United, a/w SEIU  6. DECLARATION 1 declare that I have reset the above charge and that the statements are true to the bost of my knowledge and belief.  6. Michael Dolce 6. Michael Dolce, 471 Voorhees Ave, Buffalo, NY 14216  May 9, 2022  Fat No.  E-ma			
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134  402 College Ave, Ste 402, Ithaca, NY 14850  Type of Estab shment (factory, mine, wholesaler, etc.) [] ident ty principal product or service Food and beverage The above named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2. Bas s of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  See Attached  4b. Te. No.  See Attached  4c. Ce. No.  4d. Fax. No.  4e. e-ma globadomajir@mjb.org  5. Fu name of nations or international abor organization of which 1 s an affill alle or constituent unit (to be filled in when charge is filled by a labor organization)  Workers United, al/w SEIU  6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  (signature of representative or person making charge)  (Printhype name and title or office if any)  Fax No.  e-ma			
2401 Utah Avenue South, Suite 800 Seattle, WA 98134  402 College Ave, Ste 402, Ithaca, NY 14850  Type of Estab shment (factory, mine, wholesaler, etc.)  Coffee Shop  In Number of workers emp oyed 30  Type of Estab shment (factory, mine, wholesaler, etc.)  Food and beverage  The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5)  of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2. Bas s of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  See Attached  3. Fu name of party 1 in charge (if labor organization, give full name, including local name and number)  Workers United  4a. Address (Street and number, city, state, and 2IP code)  2954 Main Street, Suite 556  Buffalo, NY 14214  4b. Te. No.  4c. Ce. No.  4d. Fax No.  4e. e-ma gbonadonan;i@mjb.org stilled by a labor organization)  Workers United, a/w SEIU  6. DECLARATION  I doclare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  (signature of representative or person making charge)  (Print/type name and fitte or office if any)  Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216  May 9, 2022			f. Fax. No.
Seattle, WA 98134  402 College Ave, Ste 402, Ithaca, NY 14850  Type of Estab shment (factory, mine, wholesaler, etc.) [ Ident typ rincpa product or service Pood and beverage  The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (itist subsections) (3); (5)  practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2 Bas of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  See Attached  3. Fu name of party 1 ing charge (if labor organization, give full name, including local name and number)  Workers United  4a. Address (Cheet and number, city, state, and ZIP code)  2954 Main Street, Suite 556  Buffalo, NY 14214  4b. Te. No.  4c. Ce. No.  4d. Fax No.  4e. e-ma  4d. Fax No.  1 declare that 1 have read the above charge and that the statements are true to the best of my knowledge and belief.  //s/ Michael Dolce  //s/ Michael Dolce  //s/ Michael Dolce  //s/ No. 14216  May 9, 2022			
Type of Estab shment (flactory, mine, wholesaler, etc.)  Type of Estab shment (flactory, mine, wholesaler, etc.)  Type of Estab shment (flactory, mine, wholesaler, etc.)  The above-named employer has engaged in and is engaging in untair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5)  of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2. Bas so film Charge (set forth a clear and concise statement of the facts constituting the alleged untair labor practices)  See Attached  3. Fu name of party 1 ng charge (if labor organization, give full name, including local name and number)  Workers United  4a. Address (Gireet and number, city, state, and ZIP code)  2954 Main Shreet, Suite 556  Buffalo, NY 14214  4b. Te. No.  585-473-3280  4c. Ce. No.  4d. Fax No.  4e. e-mag bonadomanis*errjb.org  5. Fu name of nationa or international abor organization of which it is an affiliate or constituent unit (to be filled in when charge is filled by a labor organization)  Workers United, a/w SEIU  1 declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Michael Dolice  (alignature of representative or person making charge)  (Printbype name and attic or office if any)  Hayes Dolice, 471 Voorhees Ave, Buffalo, NY 14216  May 9, 2022	· · · · · · · · · · · · · · · · · · ·		
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(list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2. Bas s of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  See Attached  3. Furname of party 1 ing charge (if labor organization, give full name, including local name and number)  Workers United  4a. Address (Street and number, city, state, and ZIP code)  2954 Main Street, Suite 556  Buffalo, NY 14214  4c. Ce. No.  4d. Fax No.  4e. e-ma gbonadoman;r@rrjb.org  5. Furname of national or international abor organization)  Workers United, a/w SEIU  6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Michael Dolce //s/ Michael Dolce, 471 Voorhees Ave, Buffalo, NY 14216  May 9, 2022  first No.  e-ma			•
(list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2. Bas s of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  See Attached  3. Furname of party 1 ing charge (if labor organization, give full name, including local name and number)  Workers United  4a. Address (Street and number, city, state, and ZIP code)  2954 Main Street, Suite 556  Buffalo, NY 14214  4c. Ce. No.  4d. Fax No.  4e. e-ma gbonadoman;r@rrjb.org  5. Furname of national or international abor organization)  Workers United, a/w SEIU  6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Michael Dolce //s/ Michael Dolce, 471 Voorhees Ave, Buffalo, NY 14216  May 9, 2022  first No.  e-ma	The above-named employer has engaged in and is engage	ging in unfair labor practices within the meaning of sec	tion 8(a), subsections (1) and
practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2. Bas s of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  3. Fu name of party 1 ng charge (if labor organization, give full name, including local name and number)  Workers United  4a. Address (Gireet and number, city, state, and ZIP code) 2954 Main Street, Suite 556  Buffalo, NY 14214  4d. Fax No.  4d. Fax No.  4e. e-ma globnadonna;r@rijb.org  5. Fu name of nationa or international abor organization of which it is an affiliate or constituent unit (to be filled in when charge is filled by a labor organization)  Workers United, a/w SEIU  6. DECLARATION 1 declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Michael Dolce //s/ Michael Dolce //s/ Michael Dolce //s/ Michael Dolce //s/ Workers Ave, Buffalo, NY 14216 //s/ May 9, 2022 //s/ May 9, 2022	(list subsections) (3); (5)	of the National Labo	or Relations Act, and these unfair labor
meaning of the Act and the Postal Reorganization Act.  2. Bas s of the Charge (set torth a clear and concise statement of the facts constituting the alleged unfair labor practices)  See Attached  3. Fu name of party 1 ng charge (if labor organization, give full name, including local name and number)  Workers United  4a. Address (Sireel and number, city, state, and ZIP code)  2954 Main Street, Suite 556  Buffalo, NY 14214  4c. ce No.  4d. Fax No.  4e. e-ma gbonadomania*(@rijb.org  5. Fu name of nationa or international abor organization)  Workers United, a/w SEIU  6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Michael Dolce //s/ Michael Dolce //s/ Michael Dolce //s/ Michael Dolce //s/ Northees Ave, Buffalo, NY 14216  May 9, 2022  4b. Te. No.  585-473-3280  4c. Ce No.  4d. Fax No.  716-912-3480  Off ce, 1 any, Ce No.  Fax No.  6-ma			
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Workers United  4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214  4c. Ce No.  4d. Fax No.  4e. e-ma gbonadomajr@rrjb.org  5. Fu name of nat ona or international abor organization of which it is an affiliate or constituent unit (to be filled in when charge is filled by a labor organization)  Workers United, a/w SEIU  6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Michael Dolce  (signature of representative or person making charge)  (Print/type name and title or office it any)  Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216  May 9, 2022  4b. Te. No.  7to No.  716-912-3480  Office, 1 any, Ce No.  Fax No.  e-ma		ement of the facts constituting the alleged unfair labor	practices)
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4d. Fax No.  4e. e-ma gbonadonnajr@rrjb.org  5. Fu name of nat ona or international abor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)  Workers United, a/w SEIU  6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Michael Dolce Michael Dolce, Attorney  (signature of representative or person making charge)  (Print/type name and title or office if any)  Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216  May 9, 2022  e-ma	2954 Main Street, Suite 556		585-473-3280
4e. e-ma gbonadonnajr@rrjb.org  5. Fu name of nat ona or international abor organization of which it is an affiliate or constituent unit (to be filled in when charge is filled by a labor organization)  Workers United, a/w SEIU  6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Michael Dolce  Michael Dolce, Attorney  (signature of representative or person making charge)  (Print/type name and title or office if any)  Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216  May 9, 2022  e-ma	Buffalo, NY 14214		4c. Ce No.
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I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Michael Dolce Michael Dolce, Attorney  (signature of representative or person making charge) (Print/type name and title or office if any)  Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216 May 9, 2022  e-ma	6 DECL	ADATION	Te. No.
/s/ Michael Dolce Michael Dolce, Attorney  (signature of representative or person making charge) (Print/type name and title or office if any)  Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216 May 9, 2022  e-ma	I declare that I have read the above charge and that the statements		
Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216  May 9, 2022  e-ma			Office, flany, Ce No.
Address	(signature of representative or person making charge)	(Print/type name and title or office if any)	Fax No.

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

# Section 1.e - Employer Representatives



### Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about November 2021 and continuing to present, by engaging in surveillance
  of employees and creating the impression of surveillance by stationing multiple "support
  managers" at the College Ave. store;
- Since about November 2021 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the College Ave. store during additional operating hours;
- Since about November 2021 and continuing to present, by creating the impression of surveillance and intimidating employees by having high-ranking corporate officials repeatedly visit the College Ave. store;
- Since about November 2021 and continuing to present, by installing security cameras in the College Ave. store to surveil and otherwise intimidate employees in response to organizing activity;
- Since about November 2021 and continuing to present, by interrogating and otherwise intimidating Union supporters at the College Ave. store;
- Since about November 2021 and continuing to April 2022, by holding mandatory or effectively mandatory captive audience meetings;
- Since about November 2021 and continuing to April 2022, by threatening employees with the loss of benefits if they chose to unionize;
- On February 6, 2022, by threatening an employee with the loss of benefits if they chose to unionize;
- On March 9, 2022, by threatening an employee with the loss of benefits if they chose to unionize;
- On March 21, 2022, by threatening employees with discipline, including suspensions and write-ups, in response to union activity;
- Since about November 2021 and continuing to April 2022, by soliciting employee grievances in response to organizing activity;
- Since about November 2021 and continuing to April 2022, by promising employees benefits in response to organizing activity and employee grievances;
- In about November 2021, by promising employees more hours in response to organizing activity and employee grievances;
- On February 23, 2022, by promising employees free parking outside the store on College Ave. in response to organizing activity and employee grievances;

- On March 24, 2022, by promising employees a remodel of the store in response to organizing activity and employee grievances;
- Since about November 2021 and continuing to April 2022, by granting benefits in response to organizing activity and employee grievances;
- In January 2022, by improving equipment and facilities at the College Ave. store in response to organizing activity and employee grievances;
- In about January 2022 and continuing to March 2022, remodeling the store to remedy employees' grievances regarding store conditions;
- On January 30, 2022, by allowing employees to enforce the mask mandate and remove noncompliant customers from the store, thereby granting a benefit in response to organizing activity and employee grievances;
- In about March 2022, by no longer allowing shift supervisors to close the store's café, and shut down mobile ordering upon request;
- In about February 2022 and continuing to present, by changing where and how trainees at the College Ave. store are trained, resulting in loss of income and changed working conditions for employees at the store;
- On March 21, 2022, by changing its back-of-house drink policy in response to union activity;
- On February 24, 2022, by no longer allowing shift supervisors to cover barista shifts and by altering shift supervisors' playcalling responsibilities;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;
- In about March 2022 and continuing to present, by enforcing a new "limited availability" policy in response to union activity;
- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about February 2022 and continuing to April 2022, by recruiting and hiring new employees while cutting existing employees' hours in response to union activity;
- In about March 2022 and continuing to April 2022, by transferring in employees to the College Ave. store from other stores in response to union activity;
- In about March 2022 and continuing to April 2022, by discriminatorily enforcing its "pin" policy to exclude union paraphernalia;
- Since about January 2022 and continuing to April 2022, by removing union posters and paraphernalia from break areas and the community board in response to organizing activity;

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- In about November 2021, for disciplining an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to April 2022, for not accommodating the time-off requests of six employees in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for threatening employees with discharge for taking time-off in response to union activity and to discourage union activity;

- On April 19, 2022, by disciplining and issuing a Final Written Warning to an employee after not granting previously accommodated time-off requests;
- In about April 2022, by constructively discharging an employee after they were not granted previously accommodated time-off requests;
- On April 26, 2022, by disciplining and issuing a Written Warning to an employee for violations of previously unenforced rules in response to union activity and to discourage union activity;
- In about April 2022, by constructively discharging an employee after refusing to accommodate previously granted accommodations;
- In about April 2022 and continuing to present, by denying the previously permitted and/or approved transfers to other stores in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for not accommodating the time-off requests of employees in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for threatening employees with discharge for taking time-off in response to union activity and to discourage union activity;
- Since about February 2022 and continuing to present, union supporters have had their hours cut in response to their union activity and to discourage union activity;
- Since about March 2022 and continuing to present, by attempting to force employees to take LOAs because of their union activity and to discourage union activity;
- Since about February 2022 and continuing to present, by reducing the shifts available to shift supervisors and altering their job responsibilities in response to union activity and to discourage union activity;
- Since about March 2022 and continuing to present, by refusing to permit union supporters to train new employees;
- In about March 2022, by not signing an employee's LOA request in response to union activity and to discourage union activity;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against employees because of their union activity and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the disciplines or changes in scheduling of employees, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD AMENDED CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date F ed	
3-CA-295470	June 6, 2022	

#### **INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in	·	urring.
	OYER AGAINST WHOM CHARGE IS BROUGHT	N
a. Name of Emp oyer Starbucks Corporation		b. Te . No. (b) (6), (b) (7)(C)
		c. Ce No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Emp oyer Representat ve	
2401 Utah Avenue South, Suite 800	Howard Schultz, CEO	g. e-ma (b) (6), (b) (7)(C) @ starbucks.com
Seattle, WA 98134		estarbucks.com
700 0 March - Ot Black NV 44050	(See attached for District Managers)	h. Number of workers emp oyed
722 S. Meadow St., Ithaca, NY 14850		30
. Type of Estab shment (factory, mine, wholesaler, etc.) Coffee Shop	j. Ident fy pr nc pa product or serv ce Food and beverage	
The above-named employer has engaged in and is engage	ging in unfair labor practices within the meaning of sect	tion 8(a), subsections (1) and
(list subsections) (3); (5)	of the National Labo	or Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are pra	ctices affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
2. Bas s of the Charge (set forth a clear and concise state See Attached	ement of the facts constituting the alleged unfair labor p	oractices)
3. Fu name of party f ng charge (if labor organization, g Workers United	ive full name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556		4b. Te . No. 585-473-3280
Buffalo, NY 14214		4c. Ce No.
		4d. Fax No.
		4e. e-ma gbonadonnajr@rrjb.org
5. Fu name of nat ona or nternat ona abor organ zat or	of which it is an afficate or constituent unit (to be filled	in when charge is filed by a labor organization)
Workers United, a/w SEIU		, , , , , , , , , , , , , , , , , , , ,
6 DECL	ARATION	Te . No.
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. /s/ Michael Dolce Michael Dolce, Attorney		716-912-3480
		Office, fany, Ce No.
(signature of representative or person making charge) (Print/type name and title or office if any)		Fax No.
Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216  Address Date June 3, 2022		e-ma mdolce@hayesdolce.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

# Section 1.e - Employer Representatives



### Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about January 2022 and continuing to present, by engaging in surveillance
  of employees and creating the impression of surveillance by stationing multiple "support
  managers" at the Meadows store;
- Since about January 2022 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the Meadows store during additional operating hours;
- Since about January 2022 and continuing to present, by creating the impression of surveillance and intimidating employees by having high-ranking corporate officials repeatedly visit the Meadows store;
- Since about January 2022 and continuing to present, by interrogating and otherwise intimidating Union supporters at the Meadows store;
- Since about January 2022 and continuing to April 2022, by threatening employees with the loss of benefits if they chose to unionize;
- Since about January 2022 and continuing to April 2022, by soliciting employee grievances in response to organizing activity;
- In about January 2022, by shutting down and temporarily closing the Meadows store in response to organizing activity;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;
- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about February 2022 and continuing to present, by recruiting and hiring new employees while cutting existing employees' hours in response to union activity;
- In about March 2022 and continuing to April 2022, by discriminatorily enforcing its "pin" policy to exclude union paraphernalia;

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

 On February 23, 2022, for disciplining an employee in response to union activity and to discourage union activity;

- In about March 2022 and continuing to present, for cutting the hours of employees in response to union activity and to discourage union activity;
- In about February 2022 and continuing to present, for disciplining employees in response to union activity and to discourage union activity;
- In about April 2022, for disciplining an employee for protected concerted activity in response to union activity and to discourage union activity;
- In about April 2022, for not granting an employee's previously accommodated time-off requests in response to union activity and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the disciplines or changes in scheduling of employees, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

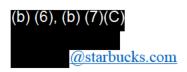
DO NOT WRITE IN THIS SPACE		
Case	Date F ed	
03-CA-295474	5/10/2022	

### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in	which the alleged unfair labor practice occurred or is occ	urring.
1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Emp oyer		b. Te . No.
Starbucks Corporation		(b) (6), (b) (7)(C)
		c. Ce No.
		f. Fax. No.
d Address (St. 1 // L. 1 TIP. 1)	a Francius Depresentatus	I. I da. INO.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800	e. Emp oyer Representat ve Howard Schultz, CEO	g. e-ma
Seattle, WA 98134	Howard Schulz, CEO	(b) (6), (b) (7)(C) @starbucks.com
Seattle, VVA 90134	(See attached for District Managers)	
722 S. Meadow St., Ithaca, NY 14850	(See attached for District Mariagers)	h. Number of workers emp oyed
722 O. Meddow Ot., Mided, 141 14000		30
. Type of Estab shment (factory, mine, wholesaler, etc.)	j. Ident fy pr nc pa product or serv ce	
Coffee Shop	Food and beverage	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of sec	tion 8(a), subsections (1) and
(list subsections) (3); (5)	of the National Labo	or Relations Act, and these unfair labor
practices are practices affecting commerce within the mea		
meaning of the Act and the Postal Reorganization Act.		
2. Bas s of the Charge (set forth a clear and concise state	ement of the facts constituting the alleged unfair labor	practices)
See Attached	men of the lace concentumly the amoget times have f	
2 Eu name of party fing charge /if labor arganization a	ive full manner in all ding level manner and mumber)	
3. Fu name of party f ng charge (if labor organization, g Workers United	ive full name, including local name and number)	
	-1	4b. Te . No.
4a. Address (Street and number, city, state, and ZIP code)		585-473-3280
2954 Main Street, Suite 556		
Buffalo, NY 14214		4c. Ce No.
		4d. Fax No.
		4e. e-ma
		gbonadonnajr@rrjb.org
5. Fu name of nat ona or nternat ona abor organ zat or	n of which it is an affiliate or constituent unit (to be filled	l in when charge is filed by a labor organization)
Workers United, a/w SEIU		
Workers United, a/w SETU		
6. DECL	ARATION	Te. No.
I declare that I have read the above charge and that the statements		716-912-3480
	ny knowledge and belief.	Office, flany, Ce No.
/s/ Michael Dolce	Michael Dolce, Attorney	
(signature of representative or person making charge)	(Print/type name and title or office if any)	Fax No.
Hayes Dolce, 471 Voorhees Ave, Buffalo	, NY 14216 May 9, 2022	e-ma
Address	Date	— mdolce@hayesdolce.com
		indicate Charles and in the control of the control

#### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

# Section 1.e - Employer Representatives



### Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about January 2022 and continuing to present, by engaging in surveillance
  of employees and creating the impression of surveillance by stationing multiple "support
  managers" at the Meadows store;
- Since about January 2022 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the Meadows store during additional operating hours;
- Since about January 2022 and continuing to present, by creating the impression of surveillance and intimidating employees by having high-ranking corporate officials repeatedly visit the Meadows store;
- Since about January 2022 and continuing to present, by installing security cameras in the Meadows store to surveil and otherwise intimidate employees in response to organizing activity;
- Since about January 2022 and continuing to present, by interrogating and otherwise intimidating Union supporters at the Meadows store;
- Since about January 2022 and continuing to April 2022, by holding mandatory or effectively mandatory captive audience meetings;
- Since about January 2022 and continuing to April 2022, by threatening employees with the loss of benefits if they chose to unionize;
- Since about January 2022 and continuing to April 2022, by soliciting employee grievances in response to organizing activity;
- Since about January 2022 and continuing to April 2022, by promising employees benefits in response to organizing activity and employee grievances;
- Since about January 2022 and continuing to April 2022, by granting benefits in response
  to organizing activity and employee grievances;
- In about January 2022, by shutting down and temporarily closing the Meadows store in response to organizing activity;
- In January 2022, by improving equipment and facilities at the Meadows store in response to organizing activity and employee grievances;
- In about January 2022 and continuing to present, by changing where and how trainees at the Meadows store are trained, resulting in loss of income and changed working conditions for employees at the store;

- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;
- In about March 2022 and continuing to present, by enforcing a new "limited availability" policy in response to union activity;
- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about February 2022 and continuing to present, by recruiting and hiring new employees while cutting existing employees' hours in response to union activity;
- In about March 2022 and continuing to April 2022, by transferring in employees to the Meadows store from other stores in response to union activity;
- In about March 2022 and continuing to April 2022, by discriminatorily enforcing its "pin" policy to exclude union paraphernalia;
- Since about January 2022 and continuing to April 2022, by removing union posters and paraphernalia from break areas and the community board in response to organizing activity.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- On January 31, 2022, by threatening an employee in response to union activity and to discourage union activity;
- On February 23, 2022, for disciplining an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for cutting the hours of employees in response to union activity and to discourage union activity;
- In about February 2022 and continuing to present, for disciplining employees in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for constructively discharging employees due to hour cuts and discriminatory enforcement of company policies;
- On March 26, 2022, by not granting a previously granted accommodation to an employee in response to union activity and to discourage union activity;
- On March 26, 2022, by refusing to let a partner work their shift and ordering them to leave the facility in response to union activity and to discourage union activity;
- On March 26, 2022, by threatening to call the police on an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to April 2022, for suspending an employee in response to union activity and to discourage union activity;
- In about April 2022, for disciplining an employee for protected concerted activity in response to union activity and to discourage union activity;
- In about April 2022, for not granting an employee's previously accommodated time-off requests in response to union activity and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an

opportunity to bargain over the disciplines or changes in scheduling of employees, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD **CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE		
	Date Filed	
3-CA-295541	5/10/2022	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.  1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT		
a. Name of Employer		(b) (6), (b) (7)(C)
Starbucks Corporation		(b) (b), (b) (7)(c)
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800	e. Employer Representative Howard Schultz, CEO	
Seattle, WA 98134	Howard Schultz, CEO	(b) (6), (b) (7)(C) (a) starbucks.com
	(b) (6), (b) (7)(C)	<u></u>
4243 Genesee St., Cheektowaga, NY 14225	starbucks.com	h. Number of workers employed
	staroucks.com	30
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of sect	ion 8(a), subsections (1) and
(list subsections) (5)	of the National Labo	r Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practices	ctices affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
2. Basis of the Charge (set forth a clear and concise state In the past six months, the above-named Employer	ement of the facts constituting the alleged unfair labor p	ractices) interfered with, restrained, and
coerced employees in the exercise of their rights as		
Starting in or around May 2022 and continuing, Starbucks has refused to engage in bargaining with the Union using a virtual meeting platform, despite proposing and agreeing to "ground rules" that required mutual agreement to meet in person, and has failed to bargain over any changes it wishes to propose to those "ground rules."		
Full name of party filing charge (if labor organization, gaworkers United)	ive full flame, including local flame and flumber)	
4a. Address (Street and number, city, state, and ZIP code 2954 Main Street, Suite 556	<del>)</del>	4b. Tel. No. 585-473-3280
Buffalo, NY 14214  4c. Cell No.		4c. Cell No.
		4d. Fax No.
		4e. e-mail gbonadonnajr@rrjb.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Workers United, a/w SEIU		
6. DECL	ARATION	Tel. No.
I declare that I have read the above charge and that the statements  // are true to the best of my knowledge and belief.		716-608-3427
an Hayes	Ian Hayes, Attorney	Office, if any, Cell No.
(signature o represen a ve or person making charge)	(Print/type name and title or office, if any)	Fax No.
Hayes Dolce		
Address 471 Voorhees Ave., Buffalo, NY 14216	Date May 10, 2022	e-mail ihayes@hayesdolce.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
3-CA-295542	5/10/2022	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT		
	OTER AGAINST WHOM CHARGE IS DROUGHT	
a. Name of Employer Starbucks Corporation		(b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Employer Representative	
2401 Utah Avenue South, Suite 800	Howard Schultz, CEO	(b) (6), (b) (7)(C) (c) extenders also acres
Seattle, WA 98134	(b) (6), (b) (7)(C)	@starbucks.com
933 Elmwood Avenue, Buffalo, NY 14222-1211	starbucks.com	h. Number of workers employed 30
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of secti	on 8(a), subsections (1) and
(list subsections) (5)		r Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act. or these unfair labor practices are prac	ctices affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		, and the second
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:		
Starting in or around May 2022 and continuing, Starbucks has refused to engage in bargaining with the Union using a virtual meeting platform, despite proposing and agreeing to "ground rules" that required mutual agreement to meet in person, and has failed to bargain over any changes it wishes to propose to those "ground rules."		
3. Full name of party filing charge (if labor organization, gaworkers United	ive full name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code 2954 Main Street, Suite 556	e)	4b. Tel. No. 585-473-3280
Buffalo, NY 14214  4c. Cell No.		4c. Cell No.
		4d. Fax No.
		4e. e-mail gbonadonnajr@rrjb.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Workers United, a/w SEIU		
, I declare that I have read the abo	ARATION ve charge and that the statements	Tel. No. 716-608-3427
lan Hayes	ny knowledge and belief. Ian Hayes, Attorney	Office, if any, Cell No.
(signature o represen a ve or person making charge)	(Print/type name and title or office, if any)	Fax No.
Hayes Dolce Address 471 Voorhees Ave., Buffalo, NY 14216	Date May 10, 2022	e-mail ihayes@hayesdolce.com
		, , ,

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date F ed	
3-CA-295545	5/11/2022	

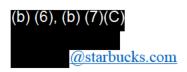
#### **INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

File an original with NLRB Regional Director for the region in		curring.
	OYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Emp oyer Starbucks Corporation		b. Te . No. (b) (6), (b) (7)(C)
		c. Ce No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Emp oyer Representat ve	
2401 Utah Avenue South, Suite 800	Howard Schultz, CEO	g. e-ma
Seattle, WA 98134		(b) (6), (b) (7)(C) @ starbucks.com
	(See attached for District Managers)	
130 E. Seneca St., Ithaca, NY 14850		h. Number of workers emp oyed 20
. Type of Estab shment (factory, mine, wholesaler, etc.) Coffee Shop	j. Ident fy pr nc pa product or serv ce Food and beverage	
The above-named employer has engaged in and is engaged	ning in unfair labor practices within the meaning of sec	ction 8(a), subsections (1) and
(list subsections) (3); (5)	,	or Relations Act, and these unfair labor
		•
practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	aning of the Act, of these unial labor practices are pr	actices affecting commerce within the
2. Bas s of the Charge (set forth a clear and concise state See Attached	ement of the facts constituting the alleged unlair labor	practices)
3. Fu name of party f ng charge <i>(if labor organization, g</i> Workers United	ive full name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code	9)	4b. Te . No.
2954 Main Street, Suite 556		585-473-3280
Buffalo, NY 14214		4c. Ce No.
		4d. Fax No.
		4e. e-ma gbonadonnajr@rrjb.org
Fu name of nat ona or nternat ona abor organ zat or	of which it is an affiliate or constituent unit (to be filled	d in when charge is filed by a labor organization)
Workers United, a/w SEIU		The whole ordings to mode by a labor organization,
e DECL	ARATION	Te . No.
	ve charge and that the statements	716-912-3480
	ny knowledge and belief.	
/s/ Michael Dolce	Michael Dolce, Attorney	Off ce, f any, Ce No.
(signature of representative or person making charge)	(Print/type name and title or office if any)	Fax No.
Hayes Dolce, 471 Voorhees Ave, Buffalo	, NY 14216 May 10, 2022	e-ma
Address Date		mdolce@hayesdolce.com

# WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

# Section 1.e - Employer Representatives



### Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about November 2022 and continuing to present, by engaging in surveillance
  of employees and creating the impression of surveillance by stationing multiple "support
  managers" at the Meadows store;
- Since about November 2022 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the Meadows store during additional operating hours;
- Since about November 2022 and continuing to present, by creating the impression of surveillance and intimidating employees by having high-ranking corporate officials repeatedly visit the Meadows store;
- Since about November 2022 and continuing to present, by interrogating and otherwise intimidating Union supporters at the Meadows store;
- Since about March 2022 and continuing to April 2022, by holding mandatory or effectively mandatory captive audience meetings;
- Since about January 2022 and continuing to April 2022, by threatening employees with the loss of benefits if they chose to unionize;
- Since about November 2022 and continuing to April 2022, by soliciting employee grievances in response to organizing activity;
- Since about November 2022 and continuing to April 2022, by promising employees benefits in response to organizing activity and employee grievances;
- In about November 2022, by promising employees free parking outside the store in response to organizing activity and employee grievances;
- Since about November 2022 and continuing to April 2022, by granting benefits in response to organizing activity and employee grievances;
- In about November 2022 and continuing to present, by shutting down and temporarily closing the Commons store in response to organizing activity;
- In about December 2022, by improving equipment and facilities at the Commons store in response to organizing activity and employee grievances;
- In about November 2022 and continuing to present, by changing where and how trainees in the Ithaca area are trained;
- In about January, by altering shift supervisors' playcalling responsibilities;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;

- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about April 2022 and continuing to present, by recruiting and hiring new employees while cutting existing employees' hours in response to union activity;
- In about March 2022 and continuing to present, by discriminatorily enforcing its "pin" policy to exclude union paraphernalia;
- Since about January 2022 and continuing to present, by removing union posters and paraphernalia from break areas and the community board in response to organizing activity.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- In about February 2022, by disciplining an employee for hanging up union materials outside of the Starbucks store not on Starbucks property;
- On March 1, 2022 by disciplining and issuing a Final Written Warning to an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for cutting the hours of employees in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for disciplining employees in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for disciplining shift supervisors for violations of other staff;
- In about March 2022 by disciplining and issuing a Written Warning to an employee in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for changing schedules at the last minute in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for constructively discharging employees due to hour cuts and discriminatory enforcement of company policies.

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the disciplines or changes in scheduling of employees, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD AMENDED CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date F ed	
3-CA-295545	6/6/2022	

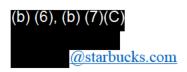
#### **INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

File an original with NERB Regional Director for the region in		arring.
	OYER AGAINST WHOM CHARGE IS BROUGHT	1
a. Name of Emp oyer Starbucks Corporation		b. Te . No. (b) (6), (b) (7)(C)
		c. Ce No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Emp oyer Representat ve	
2401 Utah Avenue South, Suite 800 Seattle, WA 98134	Howard Schultz, CEO	g. e-ma (b) (6), (b) (7)(C) @starbucks.com
Seattle, WA 90134	(See attached for District Managers)	
130 E. Seneca St., Ithaca, NY 14850	(coo amanaga ay	h. Number of workers emp oyed 20
. Type of Estab shment (factory, mine, wholesaler, etc.) Coffee Shop	j. Ident fy pr nc pa product or serv ce Food and beverage	
The above-named employer has engaged in and is engage	ging in unfair labor practices within the meaning of sect	tion 8(a), subsections (1) and
(list subsections) (3); <del>(5)</del>	of the National Labo	or Relations Act, and these unfair labor
practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	aning of the Act, or these unfair labor practices are pra	ctices affecting commerce within the
Bas s of the Charge (set forth a clear and concise state See Attached  3. Fu name of party f ng charge (if labor organization, g. Workers United)		
4a. Address (Street and number, city, state, and ZIP code	9)	4b. Te . No.
2954 Main Street, Suite 556		585-473-3280
Buffalo, NY 14214		4c. Ce No.
		4d. Fax No.
		4e. e-ma gbonadonnajr@rrjb.org
5. Fu name of nat ona or nternat ona abor organ zat or	n of which it is an affiliate or constituent unit (to be filled	in when charge is filed by a labor organization)
Workers United, a/w SEIU		
6. DECL	ARATION	Te . No.
I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		716-912-3480
/s/ Michael Dolce	Michael Dolce, Attorney	Off ce, f any, Ce No.
(signature of representative or person making charge)	(Print/type name and title or office if any)	Fax No.
Hayes Dolce, 471 Voorhees Ave, Buffalo, Address	- I 2 2022	e-ma — mdolce@hayesdolce.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

# Section 1.e - Employer Representatives



### Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about November 2022 and continuing to present, by engaging in surveillance
  of employees and creating the impression of surveillance by stationing multiple "support
  managers" at the Commons store;
- Since about November 2022 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the Commons store during additional operating hours;
- In about November 2022 and continuing to present, by changing where and how trainees in the Ithaca area are trained;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;
- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about April 2022 and continuing to present, by recruiting and hiring new employees while cutting existing employees' hours in response to union activity;
- In about March 2022 and continuing to present, by discriminatorily enforcing its "pin" policy to exclude union paraphernalia;
- Since about January 2022 and continuing to present, by removing union posters and paraphernalia from break areas and the community board in response to organizing activity.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- In about February 2022, by disciplining an employee for hanging up union materials outside of the Starbucks store not on Starbucks property;
- On March 1, 2022 by disciplining and issuing a Final Written Warning to an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for cutting the hours of employees in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for disciplining employees in response to union activity and to discourage union activity;

• In about March 2022 and continuing to present, for disciplining shift supervisors for violations of other staff;

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case 03-CA-298904	Date Filed 7/7/2022	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

The an original with NERB Regional Director for the region in which the aneged unian rabor practice occurred or is occurring.			
1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer Starbucks Corporation		(b) (6), (b) (7)(C)	
		c. Cell No.	
		f. Fax. No.	
d. Address (Street, city, state, and ZIP code)	e. Employer Representative		
2401 Utah Avenue South, Suite 800	Howard Schultz, CEO	(b) (6), (b) (7)(C) (c) starland 1-8	
Seattle, WA 98134	(b) (6), (b) (7)(C)	@starbucks.com	
3220 Sheridan Drive, Amherst, NY 14226 /		h. Number of workers employed	
3611 Delaware Ave, Buffalo, NY 14217	@starbucks.com	30	
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage		
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of sect	ion 8(a), subsections (1) and	
(list subsections) (3) (5)	of the National Labo	r Relations Act, and these unfair labor	
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are pra	ctices affecting commerce within the	
meaning of the Act and the Postal Reorganization Act.			
See attached			
3. Full name of party filing charge (if labor organization, g. Workers United	ive full name, including local name and number)		
4a. Address (Street and number, city, state, and ZIP code	9)	4b. Tel. No.	
2954 Main Street, Suite 556 Buffalo, NY 14214		585-473-3280	
		4c. Cell No.	
		4d. Fax No.	
		4e. e-mail gbonadonnajr@rrjb.org	
5. Full name of national or international labor organization Workers United, a/w SEIU	n of which it is an affiliate or constituent unit (to be filled	in when charge is filed by a labor organization)	
6 DECL	ARATION	Tel. No.	
, I declare that I have read the abo	ve charge and that the statements ny knowledge and belief.	716-608-3427	
Van Hayes	Ian Hayes, Attorney	Office, if any, Cell No.	
(signature o represen a ve or person making charge)	(Print/type name and title or office, if any)	Fax No.	
Hayes Dolce		o mail	
Address 135 Delaware Ave., Ste 502, Buffalo, NY	7 14202 Date July 7, 2022	e-mail ihayes@hayesdolce.com	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

### Section 2

In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act and engaged in conduct toward employees attempting to discourage union activity, by acts and conduct including the following:

Employees currently assigned to the store at 3611 Delaware Ave, Buffalo, NY 14217 voted to be represented by the Union, and the Union was certified as their representative on March 17, 2022. The employees are temporarily assigned there pursuant to an effects bargaining agreement the parties made.

Representatives of the Employer, including (b) (6), (b) ((b) (6), (b) (7)(C) have engaged in coercive and retaliatory activity, including threatening to discipline employees, penalizing employees by sending them home early, refusing to make minor necessary adjustments to everyday operations, among other conduct. This activity violates the parties effects bargaining agreement and the Act.

The Union seeks expedited injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
	Date F ed	
3-CA-299016	July 11, 2022	

#### **INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

File an original with NERB regional Director for the region in which the alleged unlair labor practice occurred or is occurring.			
1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT		
a. Name of Emp oyer Starbucks Corporation		b. Te . No. (b) (6), (b) (7)(C)	
		c. Ce No.	
	l =	f. Fax. No.	
d. Address (Street, city, state, and ZIP code)	e. Emp oyer Representat ve	a a ma	
2401 Utah Avenue South, Suite 800	Howard Schultz, CEO	g.e-ma (b)(6)(7)(0) @starbucks.com	
1210 Troy Schenectady Road, Latham, NY 12110	(See attached for District Managers)	h. Number of workers emp oyed 20	
. Type of Estab shment (factory, mine, wholesaler, etc.) Coffee shop	j. Ident fy pr nc pa product or serv ce Food and beverage	,	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of sec	ction 8(a), subsections (1) and	
(list subsections) (3)		or Relations Act, and these unfair labor	
practices are practices affecting commerce within the mea			
meaning of the Act and the Postal Reorganization Act.			
2. Bas s of the Charge (set forth a clear and concise state In the past six months, the above-named Employer		•	
employees in the exercise of their rights as guarant	• •		
disciplining (b) (6), (b) (7)(C) with a Final Written Wa	•	_	
3. Fu name of party f ng charge (if labor organization, g Workers United	ive full name, including local name and number)		
4a. Address (Street and number, city, state, and ZIP code 2954 Main Street, Suite 556	e)	4b. Te . No. 585-473-3280	
Buffalo, NY 14214		4c. Ce No.	
4d. Fax No.		4d. Fax No.	
		4e. e-ma gbonadonnajr@rrjb.org	
5. Fu name of nat ona or nternat ona abor organ zat or	n of which it is an aff ate or constituent unit (to be filled	d in when charge is filed by a labor organization)	
Workers United			
6 DECL	ARATION	Te . No.	
I declare that I have read the above charge and that the statements		716-912-3480	
are true to the best of my knowledge and belief. /s/ Michael Dolce Michael Dolce, Attorney		Off ce, f any, Ce No.	
(signature of representative or person making charge)	(Print/type name and title or office if any)	Fax No.	
135 Delaware Ave., Ste. 502, Buffalo, NY 14202  Address  July 9, 2022  Date		e-ma mdolce@hayesdolce.com	
1			

# WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

# Amended CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date F ed	
3-CA-299016	7/28/2022	

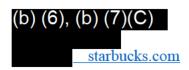
#### **INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring

1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT	g-
a. Name of Emp oyer Starbucks Corporation		b. Te . No. (b) (6), (b) (7)(C)
		c. Ce No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Emp oyer Representat ve	
2401 Utah Avenue South, Suite 800 1210 Troy Schenectady Road, Latham, NY	Howard Schultz, CEO See Attachment for District Manager	g. e-ma
12110	See Attachment for District Manager	h. Number of workers emp oyed 20
. Type of Estab shment (factory, mine, wholesaler, etc.) Coffee shop	j. Ident fy pr nc pa product or serv ce Food and beverage	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of sect	ion 8(a), subsections (1) and
(list subsections) (3); (5)	of the National Labo	or Relations Act, and these unfair labor
practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	aning of the Act, or these unfair labor practices are pra	ctices affecting commerce within the
See Attachment	ive full name including level name and number)	
3. Fu name of party f ng charge (if labor organization, g Workers United	ive tuli name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214		4b. Te . No. 585-473-3280
Duridio, IV1 14214		4c. Ce No.
		4d. Fax No.
		4e. e-ma gbonadonnajr@rrjb.org
5. Fu name of nat ona or nternat ona abor organ zat or	n of which it is an aff ate or constituent unit (to be filled	in when charge is filed by a labor organization)
Workers United		
I declare that I have read the abo	ARATION ve charge and that the statements ny knowledge and belief.	Te . No. 716-912-3480
/s/ Michael Dolce	Michael Dolce, Attorney	Off ce, f any, Ce No.
(signature of representative or person making charge)	(Print/type name and title or office if any)	Fax No.
135 Delaware Ave., Ste. 502, Buffalo, NY 14202  Address Date		e-ma mdolce@hayesdolce.com

#### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

# Section 1.e - Employer Representatives



### Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- On or about 0, 2022, by denying (b) (6), (b) (7)(C) Weingarten rights during an investigatory interview;
- On or about [6] (6), (6), (7)(C), (7)(C), (7)(C), (9), (10
- In or about June 2022, by creating the impression of surveillance by monitoring a private group chat of the store's organizing committee.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

• On or about (0,0,0)(7)(c), 2022, by disciplining (b) (6). (b) (7)(c) for engaging in protected concerted activities and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees in May 2022. Despite this, the Employer did not give notice or an opportunity to bargain in violation of its obligations to bargain under the Act, including:

- In or about June 2022, by failing to bargain over the decision to temporarily close the store, and the effects of such a decision;
- In or about 2022, by failing to bargain over the discipline of (b) (6), (b) (7)(C), and the effects of such discipline;
- In or about 2022, by failing to bargain over the discipline of (b) (6), (b) (7)(C), and the effects of such discipline.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date F ed	
03-CA-299016	7/28/2022	

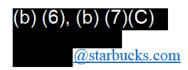
#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

rile an original with NERB Regional Director for the region in	which the alleged unial labor practice occurred or is occ	urring.
1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Emp oyer Starbucks Corporation		b. Te . No. (b) (6), (b) (7)(C)
		c. Ce No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Emp oyer Representat ve	
2401 Utah Avenue South, Suite 800	Howard Schultz, CEO	g. e-ma
		(b) (6). (b) (7)(C) @ starbucks.com
1210 Troy Schenectady Road, Latham, NY	See Attachment for District Manager	
12110		h. Number of workers emp oyed 20
. Type of Estab shment (factory, mine, wholesaler, etc.) Coffee shop	j. Ident fy pr nc pa product or serv ce Food and beverage	
The above-named employer has engaged in and is engage	ging in unfair labor practices within the meaning of sec	tion 8(a), subsections (1) and
(list subsections) (3); (5)	of the National Labo	or Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are pra	actices affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
Bass of the Charge (set forth a clear and concise state     See Attachment	ement of the facts constituting the alleged unfair labor	practices)
See Allaciment		
3. Fu name of party f ng charge (if labor organization, g	ive full name including local name and number)	
Workers United	we ruil name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556		4b. Te . No. 585-473-3280
Buffalo, NY 14214		4c. Ce No.
		Ad Fow No.
		4d. Fax No.
		4e. e-ma
		gbonadonnajr@rrjb.org
5. Fu name of nat ona or nternat ona abor organ zat or	n of which it is an aff ate or constituent unit (to be filled	I in when charge is filed by a labor organization)
Workers United		,
6 DECL	ARATION	Te . No.
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		716-912-3480
/s/ Michael Dolce	Michael Dolce, Attorney	Office, fany, Ce No.
(signature of representative or person making charge)	(Print/type name and title or office if any)	Fax No.
135 Delaware Ave., Ste. 502, Buffalo, NY	7 14202 July 28, 2022	e-ma
Address	Date	mdolce@hayesdolce.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

### Section 1.e - Employer Representatives



# Section 2 - Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- On or about [5](6),(5)(7)(6), 2022, by denying (b) (6), (b) (7)(C) Weingarten rights during an investigatory interview;
- In or about June 2022, by creating the impression of surveillance by monitoring a private group chat of the store's organizing committee.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- On or about [6](6),(6)(7)(6), 2022, by disciplining (b) (6), (b) (7)(C) with a Final Written Warning for engaging in protected concerted activities and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees in May 2022. Despite this, the Employer did not give notice or an opportunity to bargain in violation of its obligations to bargain under the Act, including:

- In or about June 2022, by failing to bargain over the decision to temporarily close the store, and the effects of such a decision;
- In or about 2022, by failing to bargain over the discipline of (b) (6), (b) (7)(C), and the effects of such discipline;
- In or about 2022, by failing to bargain over the discipline of (b) (6), (b) (7)(c), and the effects of such discipline.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
	Date F ed	
3-CA-299540	7/18/2022	

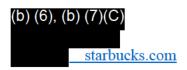
#### **INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

The air original wair NERS regional Brioder for the region in		Journing.
1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Emp oyer Starbucks Corporation		b. Te . No. (b) (6), (b) (7)(C)
		c. Ce No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Emp oyer Representat ve	
2401 Utah Avenue South, Suite 800 402 College Ave, Ste 402, Ithaca, NY 14850	Howard Schultz, CEO	g. e-ma (b)(6),(b)(7)(G)(@starbucks.com
402 College Ave, Ste 402, Itrlaca, NT 14630	See Attachment for District Manager	h. Number of workers emp oyed 20
. Type of Estab shment (factory, mine, wholesaler, etc.) Coffee shop	j. Ident fy pr nc pa product or serv ce Food and beverage	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of se	ection 8(a), subsections (1) and
(list subsections) (3); (5)	of the National La	bor Relations Act, and these unfair labor
practices are practices affecting commerce within the me	aning of the Act. or these unfair labor practices are p	ractices affecting commerce within the
meaning of the Act and the Postal Reorganization Act.	, , , , , , , , , , , , , , , , , , , ,	3
Bas s of the Charge (set forth a clear and concise state	ement of the facts constituting the alleged unfair labo	r practices)
See Attachment		
3. Fu name of party f ng charge (if labor organization, g	ive full name, including local name and number)	
Workers United		
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556		4b. Te . No. 585-473-3280
Buffalo, NY 14214		4c. Ce No.
		40. 00 140.
		4d. Fax No.
		4e. e-ma
		gbonadonnajr@rrjb.org
5. Fu name of nat ona or nternat ona abor organ zat or	n of which it is an aff ate or constituent unit (to be fille	ed in when charge is filed by a labor organization)
Workers United		
6 DECL	ARATION	Te . No.
	ve charge and that the statements	716-912-3480
	ny knowledge and belief.	Off ce, f any, Ce No.
/s/ Michael Dolce	Michael Dolce, Attorney	— Office, Fairly, Ge 140.
(signature of representative or person making charge) (Print/type name and title or office if any)		Fax No.
135 Delaware Ave., Ste. 502, Buffalo, NY	7 14202 July 18, 2022	0 m0
Address	Date 0417 10, 2022	— mdolce@hayesdolce.com
		— Indoice in a yesholee colli

# WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

### Section 1.e - Employer Representatives



# Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, and has engaged in conduct toward employees attempting to discourage union activity, by acts and conduct including the following:

- In 2022, by altering the terms and conditions of employment, and thereby constructively discharging (b) (6), (b) (7)(C);
- In [0](6)(0)(7)(C); 2022, by not granting a previously granted accommodation, disciplining, and thereby constructively discharging (b)(6), (b)(7)(C);
- In 2022, by not granting a previously accommodation, denying an LOA request, and thereby constructively discharging (b) (6), (b) (7)(C);
- In 2022, by failing to grant a previously granted accommodation, and thereby constructively discharging (b) (6), (b) (7)(C);
- In 2022, by failing to grant a previously granted accommodation, and thereby constructively discharging (b) (6), (b) (7)(C);
- In 2022, by failing to grant a previously granted accommodation, and thereby constructively discharging (b) (6), (b) (7)(C);
- In 2022, by altering the terms and conditions of employment, and thereby constructively discharging (b) (6), (b) (7)(C).

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the disciplines, changes in scheduling of employees, nor changes in other terms and conditions of employment, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date F ed	
14-CA-299315	July 13, 2022	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Emp oyer Starbucks Corporation		b. Te . No. (b) (6), (b) (7)(C)	
		c. Ce No.	
		f. Fax. No.	
d. Address (Street, city, state, and ZIP code)	e. Emp oyer Representat ve	g o mo	
2401 Utah Avenue South, Suite 800	Howard Schultz, CEO	g. e-ma <sup>(b) (b) (7)(C)</sup> @starbucks.com	
132 NW 23rd St., Oklahoma City, OK	(b) (6), (b) (7)(C)		
	@starbucks.com)	h. Number of workers emp oyed 33	
. Type of Estab shment (factory, mine, wholesaler, etc.) Coffee shop	j. Ident fy pr nc pa product or serv ce Food and beverage		
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of sectio	n 8(a), subsections (1) and	
(list subsections) (5)		Relations Act, and these unfair labor	
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practi	ices affecting commerce within the	
meaning of the Act and the Postal Reorganization Act.  2. Bas s of the Charge (set forth a clear and concise state)			
The NLRB certified the Union as the bargaining representative of employees in May 2022. Despite this, the Employer did not give notice or an opportunity to bargain over an announced change to the store's Time and Attendance Policy and call-in policy, both of which were announced in June 2022 and went into effect June 20, 2022, in violation of the Employer's obligations to bargain under the Act. The Employer has also refused to bargain over the effects of implementing such changes in policies. The Employer also threatened a Union representative in or around July 12, 2022, claiming that the duty to bargain does not extend to "policies" and only to "wages and benefits" and that the Employer would not bargain over anything for at least a year.			
Funame of party fing charge (if labor organization, gaworkers United)	ive full name, including local name and number)		
4a. Address (Street and number, city, state, and ZIP code 22 South 22nd St, Philadelphia PA 16103	e)	4b. Te . No. 646 448 6414	
22 South 22hd St, I illiadeiphia IA 10103		4c. Ce No.	
		4d. Fax No.	
		4e. e-ma rminter@pjbwu.org	
5. Fu name of national or international abort organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization).  Workers United, a/w SEIU			
I declare that I have read the abo	ARATION ve charge and that the statements	Te . No. 716-912-3480	
are true to the best of my knowledge and belief. /s/ Michael Dolce Michael Dolce, Attorney		Office, flany, Ce No.	
(signature of representative or person making charge)	(Print/type name and title or office if any)	Fax No.	
135 Delaware Ave., Ste. 502, Buffalo, NY	D-1-	e-ma mdolce@hayesdolce.com	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case		Date Filed
	14-CA-300070	July 25, 2022

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.			
1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer Starbucks Corporation		(b) (6), (b) (7)(C)	
		c. Cell No.	
		f. Fax. No.	
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 3616 N May Avenue	e. Employer Representative Howard Schultz, President and CEO (see attached for (b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) @starbucks.com	
Oklahoma City, OK 73112		h. Number of workers employed 28	
i. Type of Establishment (factory, mine, wholesaler, etc.) retail	j. Identify principal product or service coffee		
The above-named employer has engaged in and is engage	jing in unfair labor practices within the meaning of section	8(a), subsections (1) and	
(list subsections) (5)	of the National Labor R	elations Act, and these unfair labor	
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practic	es affecting commerce within the	
meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) The NLRB certified the Union as the bargaining representative of employees in June 2022. The union requested bargaining over health & safety aspects of upcoming remodeling work, as well as over employee staffing during the remodeling. Finally, the union requested information in connection with its request to bargain. Despite the approaching remodeling work, the company has not responded to the request to bargain or for information, in violation of the Employer's obligations to bargain under the Act.			
Full name of party filing charge (if labor organization, gi Workers United	ive full name, including local name and number)		
4a. Address (Street and number, city, state, and ZIP code 22 South 22nd St, Philadelphia PA 16103	9)	4b. Tel. No. 646 448 6414	
4c. Cell No.		4c. Cell No.	
4d. Fax No.			
		4e. e-mail rminter@pjbwu.org	
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) SEIU			
I declare that I have read the above	ARATION ve charge and that the statements by knowledge and belief.	Tel. No. (512) 474-6200	
manul and	Manuel Quinto-Pozos, Attorney	Office, if any, Cell No.	
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No. (512) 474-7896	
Address 707 W. 34th St., Suite 3, Austin, TX 7870	Date Jul 25, 2022	e-mail mqp@ddollaw.com	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case		Date Filed
19-CA-296424	5/24/2022	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

File an original with NERB Regional Director for the region in		ig.
1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer		b. Tel. No. (b) (6), (b) (7)(C)
Starbucks Corporation		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Employer Representative	a a mail
2401 Utah Avenue, Suite 800	Howard Schultz, CEO	g. e-mail (i) (ii) (ii) (iii)
Seattle, WA 98134		h. Number of workers employed
		Approx. 20
i. Type of Establishment (factory, mine, wholesaler, etc.)	j. Identify principal product or service	
Coffee Shop	Food and Beverage	
The above-named employer has engaged in and is engaged National Labor Relations Act, and these unfair labor practiance practices affecting commerce within the meaning of the	ices are practices affecting commerce within the meaning	
2. Basis of the Charge (set forth a clear and concise state	ment of the facts constituting the alleged unfair labor prac	tices)
Within the past six months, the Employer	has refused to provide and/or improperly d	lelaved providing information
requested by the Union that is reasonably		
with the Employer.	more than the original to the original	55 III III ST COMMENT OUI SAMMING
with the Employer.		
3. Full name of party filing charge (if labor organization, g	ive full name, including local name and number)	
Workers United		
4a. Address (Street and number, city, state, and ZIP code)		4b. Tel. No.
		(646) 448-6414
Workers United		4c. Cell No.
22 South 22 <sup>nd</sup> St		
Philadelphia, PA 19103		4d. Fax No.
1		(215) 575-9065
		4e. e-mail
		rminter@pjbwu.org
5. Full name of national or international labor organization	of which it is an affiliate or constituent unit (to be filled in w	
J	·	
Service Employees International Union		
	ARATION	Tel. No.
	ve charge and that the statements by knowledge and belief.	(206) 257-6001
die ude to the best of the	iy kilomouge alla bellet.	Office, if any, Cell No.
Marina Multhaup, Attorney		
(signature of representative or person making charge) (Print/type name and title or office, if any)		Fax No.
Barnard Iglitzin & Lavitt LLP		(206) 378-4132
18 West Mercer St., Ste. 400		e-mail
Address Seattle, WA 98119 Date 5/24/2022		multhaup@workerlaw.com
		. ~ ~

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Address Seattle, WA 98119

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD FIRST AMENDED CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
	Date Filed	
19-CA-296424	6/2/2022	

multhaup@workerlaw.com

**INSTRUCTIONS:** File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring. 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT a. Name of Employer b. Tel. No. (b) (6), (b) (7)(C) **Starbucks Corporation** c. Cell No. f. Fax. No. d. Address (Street, city, state, and ZIP code) e. Employer Representative g. e-mail (b) (6), (b) (7)(C) @ starbucks.com 2401 Utah Avenue, Suite 800 Howard Schultz, CEO Seattle, WA 98134 h. Number of workers employed Approx. 20 i. Type of Establishment (factory, mine, wholesaler, etc.) j. Identify principal product or service Coffee Shop Food and Beverage The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act. 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Within the past six months, the Employer has refused to provide and/or improperly delayed providing information requested by the Union that is reasonably necessary in order for the Union to engage in first-contract bargaining with the Employer. In addition, the Employer has not responded to the Union's request for bargaining dates making it impossible to begin bargaining a contract. 3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United 4a. Address (Street and number, city, state, and ZIP code) 4b. Tel. No. (646) 448-6414 Workers United 4c. Cell No. 22 South 22<sup>nd</sup> St Philadelphia, PA 19103 4d. Fax No. (215) 575-9065 4e. e-mail rminter@pjbwu.org 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union Tel. No. 6. DECLARATION I declare that I have read the above charge and that the statements (206) 257-6001 are true to the best of my knowledge and belief. Office, if any, Cell No. Marina Multhaup, Attorney (signature of representative or person making charge) (Print/type name and title or office, if any) Fax No. (206) 378-4132 Barnard Iglitzin & Lavitt LLP 18 West Mercer St., Ste. 400

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Date

Address Seattle, WA 98119

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

**SECOND AMENDED CHARGE AGAINST EMPLOYER** 

DO NOT WRITE IN THIS SPACE		
	Date Filed	
19-CA-296424	6/7/2022	

**INSTRUCTIONS:** File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring. 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT a. Name of Employer b. Tel. No. (b) (6), (b) (7)(C) **Starbucks Corporation** c. Cell No. f. Fax. No. d. Address (Street, city, state, and ZIP code) e. Employer Representative g. e-mail @starbucks.com 2401 Utah Avenue, Suite 800 Howard Schultz, CEO Seattle, WA 98134 h. Number of workers employed Approx. 200 i. Type of Establishment (factory, mine, wholesaler, etc.) j. Identify principal product or service Food and Beverage The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act. 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Within the past six months, at at least one of the Union-represented stores in the Pacific Northwest, the Employer has refused to provide and/or improperly delayed providing the information requested by the Union that is reasonably necessary in order for the Union to engage in first-contract bargaining with the Employer regarding that store's represented employees. In addition, the Employer has not responded to the Union's request for bargaining dates for at least fourteen other stores in the Pacific Northwest, making it impossible to begin bargaining a contract for the workers at each of those stores 3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United 4a. Address (Street and number, city, state, and ZIP code) 4b Tel No (646) 448-6414 Workers United 4c. Cell No. 22 South 22<sup>nd</sup> St Philadelphia, PA 19103 4d. Fax No. (215) 575-9065 4e. e-mail rminter@pjbwu.org 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union Tel. No. 6. DECLARATION I declare that I have read the above charge and that the statements (206) 257-6001 are true to the best of my knowledge and belief. Office, if any, Cell No. Marina Multhaup, Attorney (signature of representative or person making charge) (Print/type name and title or office, if any) Fax No. (206) 378-4132 Barnard Iglitzin & Lavitt LLP 18 West Mercer St., Ste. 400

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

6/7/2022

multhaup@workerlaw.com

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD THIRD AMENDED CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
19-CA-296424	6/14/2022	

#### **INSTRUCTIONS:**

Eile e	طفانيد احصانمانيم مر	MI DD Dawland Di	.aatau fau tha uania			e occurred or is occurring	
rne a	n originai wiin	I NEKO KEGIONAI DI	ector for the realo	i in which the alleded	a uniair iador bractice	a occurred or is occurring	4.

File an original with NLRB Regional Director for the region in		curring.
	OYER AGAINST WHOM CHARGE IS BROUGHT	1
a. Name of Employer Starbucks Corporation		b. Tel. No. (b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Employer Representative	
2401 Utah Avenue, Suite 800	Howard Schultz, CEO	g. e-mail (b) (6), (b) (7)(C) (a) starbucks.com
Seattle, WA 98134		h. Number of workers employed Approx. 200
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage	
The above-named employer has engaged in and is engaged. National Labor Relations Act, and these unfair labor practiance practices affecting commerce within the meaning of the	tices are practices affecting commerce within the mea	
2. Basis of the Charge (set forth a clear and concise state	ement of the facts constituting the alleged unfair labor	practices)
Within the past six months, at multiple Unio		
practice of refusing to bargain with workers v	•	1 4
Union's requests for bargaining dates and/or h		
to begin bargaining a contract for the workers		
the country, the Employer has refused to pr		
Union that is reasonably necessary in order for	or the Union to engage in first-contract bar	gaining with the Employer regarding
that store's represented employees.		
The Union requests 10(j) relief in this charge.		
3. Full name of party filing charge (if labor organization, g	ive full name, including local name and number)	
Workers United		
4a. Address (Street and number, city, state, and ZIP code		4b. Tel. No.
(	,	(646) 448-6414
Workers United		4c. Cell No.
22 South 22 <sup>nd</sup> St		40. OCH 140.
Philadelphia, PA 19103		4d. Fax No.
1 /		(215) 575-9065
		4e. e-mail
		rminter@pjbwu.org
5. Full name of national or international labor organization Service Employees International Union	n of which it is an affiliate or constituent unit <i>(to be fille</i>	d in when charge is filed by a labor organization)
6. DECL	ARATION	Tel. No.
I declare that I have read the above charge and that the statements		(206) 257-6001
are true to the best of n	ny knowledge and belief.	Office, if any, Cell No.
11//n # 17	Marina Multhaup, Attorney	
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
	(	(206) 378-4132
Barnard Iglitzin & Lavitt LLP 18 West Mercer St., Ste. 400		e-mail
Address <u>Seattle, WA 98119</u> Date <u>6/14/2022</u>		— multhaup@workerlaw.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE			
Case		Date Filed	
	27-CA-297804	6/17/2022	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

File an original with NLRB Regional Director for the region in	which the alleged unfair labor practice occurred or is occur	ring.
1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Starbucks Corporation		b. Tel. No. (b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	e. Employer Representative	
303 16th St., Ste. 100 Denver, CO 80202	(b) (6), (b) (7)(C)	g. e-mail
		h. Number of workers employed 25
i. Type of Establishment (factory, mine, wholesaler, etc.) Restaurant	j. Identify principal product or service Coffee	
The above-named employer has engaged in and is engage	ging in unfair labor practices within the meaning of section	on 8(a), subsections (1) and
(list subsections) (3)	of the National Labor	Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are pract	tices affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
Basis of the Charge (set forth a clear and concise state)	ement of the facts constituting the alleged unfair labor pro-	actices)
Within the past six months, Starbucks has interfere Section 7 of the Act by unlawfully by: (1) terminate		,
Section 7 of the Act by unlawfully by: (1) terminat	ting employee (b) (b) (b) (c) because engaged in	n protected concerted and union
activities; (2) more strictly and discriminatingly en	forcing workplace attendance rules against	because engaged in
protected concerted and union activities; and (3) de bargain over discipline following certification of		
prevent irreparable destruction of employee rights		
prevent irreparable destruction of employee rights	by Starbucks megar activity, which is mercasing	in aggression and severity daily.
3. Full name of party filing charge (if labor organization, g. Chicago & Midwest Regional Joint Board, Worker	ive full name, including local name and number) rs United/SEIU	
4a. Address (Street and number, city, state, and ZIP code	a)	4b. Tel. No.
Ta. Address (Street and number, only, state, and 211 code	7	312-378-6100
333 Ashland Ave.		As Call No
Chicago, Illinois 60607		4c. Cell No.
		4d. Fax No.
		4e. e-mail
F. Full name of national or international labor assessment	of which it is an affiliate or constituent unit (to be filled):	when shares is fled by a labor according to
5. Full name of national or international labor organization Workers United/SEIU	of which it is an affiliate of constituent unit (to be filled in	when charge is filed by a labor organization)
workers United/SETC		
	ARATION	Tel. No.
I declare that I have read the abo	312-372-1361	
are true to the best of my knowledge and belief.  Elizabeth L. Rowe, Attorney		Office, if any, Cell No.
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Dowd, Bloch, Bennett, Cervone, Auerbac	sh & Vokich I I P	
Address 8 S. Michigan Ave., 19th Fl., Chicago, IL		e-mail
Address o b. Milenigan Ave., 17th Ft., Chicago, IL	<ul><li>erowe@laboradvocates.com</li></ul>	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT